

who do not wish to receive any telephone solicitations and one for those who do not wish to receive telephone solicitations which use artificial or prerecorded voice technology.

2. The method for selecting an entity to establish and maintain the national database should consist of a Request for Procurement subject to federal procurement law like any other acquisition of goods or services (specifically the Brooks Act). The RFP should be issued to communications common carriers and non-carriers alike. The RFP should be written and managed by the FCC and the successful bidder should be under contract to the FCC. The database administrator should be subject to strict audit and management guidelines with strict guidelines for maintenance, upgrading and updating the database and database technology.
3. Rigid confidentiality rules should apply which limit the database administrator's use of the information solely to carry out the requirements of the Act. This should be particularly the case if a communications common carrier is the successful RFP bidder.<sup>61</sup>
4. Telephone subscribers who wish to be listed on the national "opt-out" or "do-not-call" database should have the opportunity to notify the database administrator of that intention no more than twice a year. Once listed, the subscriber should have the same twice-a-year opportunity to become "delisted." A subscriber who has been listed should be automatically "delisted" after two years unless before the end of that period the subscriber indicates to the database administrator the desire to continue as listed. Those bound by the Act should have at least 30 days from the time a national database has been finalized for a six-month period to acquire the database and to incorporate it into calling technology. This means that those bound by the Act would have 30 days before they would be bound to honor any changed national database.
5. The database should consist solely of phone numbers which subscribers wish to remove from the calling "library" of telemarketers. The database

---

<sup>61</sup>See 137 Cong. Rec. S18785 (daily ed. Nov. 27, 1991) (statement of Sen. Pressler).

should not be name-, CPE-, or location-dependent.

6. The database should be released in a variety of machine-readable magnetic media and should be compatible with a variety of system formats and architectures. Access to the database and database copies should be priced in a manner that recovers only costs including reasonable overhead.

The Commission may find that the complexity of a national database will require a separate proceeding to establish the national database, its structure and appropriate safeguards.

It is Citicorp's view, and that of the majority of commenters, that the company-specific do-not-call list approach is superior to the national database alternative.<sup>62</sup> The commenters generally prefer the company-specific do-not-call list alternative over the national database approach for a multitude of reasons, including: (1) it is the more effective; (2) it is the more efficient; (3) it entails less cost; (4) it allows the greatest flexibility; and (5) it is a convenient self-executing device to reconcile consumer privacy rights with legitimate business interests.

For example, the company-specific do-not-call list provides consumers with greater insulation from unwanted telemarketing than would be provided in a national database system under the Act. If a magazine customer requests placement on that

---

<sup>62</sup>See, e.g., Citicorp Comments at 23-28; Bell Atlantic Comments at 4; DMA Comments at 2-3; AT&T Comments at 6-10; MCI Comments at 2-6; MBNA America Bank Comments at 3-4; Household International Comments at 11-16; ANPA Comments at 4,7; Coalition Comments at 16-17; Safecard Services Comments at 5-15; Southwestern Bell Comments at 10; Pacific Telesis comments at 14; Sprint Comments at 42.

magazine's do-not-call list to avoid receiving solicitations for additional periodicals, then that person will not be called even though a TCPA exception for established business relationships might permit such a call. However, under a national do-not-call list, if that magazine customer requests placement on that list but fails to inform the magazine's marketing office, then that customer likely will be solicited under the TCPA established business relationship exception. This unintended side-effect of the national list approach disturbs the normal business-customer relationship and may subject the customer to greater unwanted solicitation than intended.

Furthermore, the TCPA allows telemarketers to make two calls per year to any person, even if that person appears on a do-not-call list, before the person may sue the telemarketer under the Act. In contrast, company-specific do-not-call lists eliminate any and all calls to individuals who request to be put on the list.

Only a limited number of commenters specifically criticize the company-specific do-not-call approach as inadequate to protect the privacy rights of residential telephone subscribers. These commenters argue that the company-specific do-not-call list alternative: (1) "place[s] an unwarranted burden on consumers to find every telemarketing firm and then notify each one separate[ly] of their desire not to be called;"<sup>63</sup> (2) would be

---

<sup>63</sup>Privacy Times Comments at 3.

an "administrative and regulatory nightmare;"<sup>64</sup> and (3) provides "no assurance that voluntary adherence to the Act by private companies . . . will be effective."<sup>65</sup> The Commission should reject these arguments and, in any event, should find them insufficient to outweigh the utility and privacy protection of the company-specific do-not-call list approach.

It will not be necessary under the company-specific do-not-call list alternative for consumers to contact every telemarketing firm to inform them that they do not wish to be called. If a consumer receives an unwanted telemarketing call from a business, the consumer can immediately inform that particular business during the phone call, or any time thereafter, to be removed from their telemarketing list. It would be unnecessary and contrary to common sense for a consumer to contact telemarketers who have not even attempted to contact him or her.

Similarly, the company-specific do not call list actually avoids the administrative nightmare contemplated by some commenters. It allows companies to use their own systems to merge names, rather than require the installation of entirely new systems and procedures. This means lower costs (no need for a company to modify its existing computer systems). It would also more effectively ensure that those consumers who do not want to

---

<sup>64</sup>Consumer Action Comments at 13.

<sup>65</sup>Id. at 15.

receive solicitations from a particular company have their wishes honored. Unlike a national database, company-specific databases are able to use a wide range of readily available identifying information, such as Social Security numbers, account numbers, PIN numbers, etc., to ensure that the database is able to verify, update, and ensure accuracy of do-not-call data such as adds, changes, and deletes. The company-specific system already has in place the information in a format that is easy for the telemarketer to access and use.

Finally, the Commission should reject the argument that there is no assurance that private companies will adhere to the Act voluntarily through an industry self-regulatory mechanism. The company-specific do not call approach enjoys the same level of "assurance" of compliance that exists for the national do not call database. The TCPA has created a private right of action for a person "who has received more than one telephone call within any 12-month period by or on behalf of the same entity in violation of the regulations prescribed under [the Act]." <sup>66</sup> This private right of action is the enforcement mechanism adopted by the Congress in the TCPA.

Citicorp, among others, recommended in its comments a number of guidelines that the Commission should require in implementing an in-house do not call list.<sup>67</sup> This could create an audit trail for the Commission to determine compliance when

---

<sup>66</sup>47 U.S.C. § 227(c)(5).

<sup>67</sup>See Citicorp Comments at 25-26.

asked to investigate violations of do-not-call requests.

For these reasons, the Commission should adopt the company-specific do not call approach for restricting telephone solicitations.

**B. The Commission's Decision on a Mechanism for Restricting Telephone Solicitations Will Not Preempt State Databases; At Most, the Contents Of A Federal Database Would Have To Be Included In Any Separate State Database**

The Ohio PUC believes that individual states may find it effective to develop and maintain a "do not call" list and recover the costs of maintaining the lists through fees charged to intrastate telemarketers. The Ohio PUC argues that the FCC should not preclude any state from developing and using its own "do not call" lists.<sup>68</sup>

If the Commission adopts a single nationwide database, the TCPA prescribes that states may not "require the use of any database, list or listing system that does not include the part of such single national database that relates to such State."<sup>69</sup> This would require states which elect to adopt a do-not-call database to incorporate into their database the state "subset" of the national database. Those telemarketers bound to comply are only those whose telemarketing traffic occurs entirely within a state. For example, if a call is forwarded to a point outside a state, even though the origination and termination points are within that state, then that call should be considered an

---

<sup>68</sup>Ohio PUC Comments at 6.

<sup>69</sup>47 U.S.C. § 227 (e)(2).

interstate call and, as such, only the FCC database rules and restrictions would apply.

In the alternative, if the Commission decides to adopt the company-specific do-not-call list approach, and a state desires to develop or maintain a state do-not-call list, then interstate telemarketers should not be bound, and the FCC should so state, by state regulations unless the telemarketing call is entirely intrastate; the origin, termination, and all circuits in between.

In addition, the rationale that led Congress to address state preemption issues in the national database context does apply should the FCC adopt the company-specific do-not-call approach. Where the FCC decrees that compliance with the TCPA must be implemented through appropriate company-specific do-not-calls lists, then the Commission should clarify that state regulators must incorporate into any do-not-call list approach they adopt the state "subset" of a company's do-not-call list.

The comments show, overwhelmingly, that the company-specific do-not-call approach is the most effective and least burdensome method for restricting telephone solicitations. Among other things, this approach affords consumers the greatest opportunity to choose the level of privacy protection that they will receive, it avoids imposing unnecessary costs or superfluous restrictions on telemarketers, and it avoids placing onerous new oversight burdens on the Commission. For these reasons, the Commission should adopt the company-specific do-not-call approach.

VIII. CONCLUSION

Citicorp asks the Commission to consider these reply comments as it develops its rules in this proceeding to implement the TCPA.

Respectfully submitted,

CITICORP

A handwritten signature in cursive script, reading "Patrick D. Hadley", is written over a horizontal line.

P. Michael Nugent  
Patrick D. Hadley  
425 Park Avenue  
2nd Floor/Zone 6  
New York, New York 10043

Clinton W. Walker  
7720 York Road  
Towson, Maryland 21204  
(301) 832-4617

Its Attorneys

June 25, 1992



CERTIFICATE OF SERVICE

I, Brenda Beatty, hereby certify that copies of the foregoing Reply Comments of Citicorp were served by hand or by First-Class United States Mail, postage prepaid, upon the parties appearing on the attached service list, this 25th day of June, 1992.

  
Brenda Beatty

David D. Weirman  
Ann Arbor News  
340 East Huron Street  
Ann Arbor, MI 48106-1147

Albert D. Gittrich  
Star-Ledger  
Star-Ledger Plaza  
Newark, NJ 07101

Maynard A. Buck, Jr.  
Free Press Standard  
43 East Main Street  
P.O. Box 37  
Carrollton, OH 44615

Steven J. Healey  
Pierce-Pepin Electric Co.  
P.O. Box 420  
Junction of Hwys 10 & 63  
Ellsworth, WI 54011

Nancy O'Malley-Harpel  
USAA Building  
San Antonio, TX 78288-0544

Judy Lanier  
American Telemarketing Association  
606 North Larchmont Boulevard  
Suite 4B  
Los Angeles, CA 90004

Christine M. Yakulik  
Johnstown Tribune  
Johnstown, PA 15907

Ronald G. Doster  
CMS A/R Services  
One Jackson Square  
P.O. Box 3500  
Jackson, MI 49204-3500

James B. Banks  
Citizen-Times  
P.O. Box 2090  
Ashville, NC 28802

Dirk C. Bloemendaal  
Amway Corporation  
7575 Fulton Street  
Ada, Michigan 49355

D. Keith Hancock  
Direct Selling Association  
1776 K Street  
Suite 600  
Washington, D.C. 20006

John D. Wright  
Wells Fargo Bank  
20th Floor  
111 Sutter Street  
San Francisco, CA 94163

William B. Barfield  
BellSouth Corporation  
1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, GA 30367-6000

Charles E. Wright  
Centel Corporation  
8725 Higgins Road  
Chicago, IL 60631

Randolf H. Aires  
Sears, Roebuck & Co.  
Suite 600  
633 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Theodore D. Frank  
Arent, Fox, Kintner,  
Plotkin & Kahn  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5339

Bruce E. Thompson  
Merrill, Lynch  
Suite 620  
3000 K Street, N.W.  
Washington, D.C. 20007

Lawrence W. Katz  
Bell Atlantic  
1710 H Street, N.W.  
Washington, D.C. 20006

William Bradford Weller  
Digital Systems  
6464 185th Avenue, N.E.  
Redmond, WA 98052-5032

Ellen S. Levine  
People of the State of California  
and the California Public  
Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Linda D. Hershman  
Southern New England  
Telephone Company  
227 Church Street  
New Haven, CT 06506

James R. Young  
United Electric Cooperative, Inc.  
P.O. Box 688  
DuBois, PA 16801

Donald M. McGrath  
National Faxlist  
P.O. Box 9777  
Trenton, NJ 08650

Ann E. Henkener  
Ohio Public Utilities Section  
180 East Broad Street  
Columbus, OH 43266-0573

Edward B. Pilkington  
Lee County Electric Cooperative, Inc.  
P.O. Box 3455  
North Fort Meyers, FL 33918-3455

Paul E. Nolting  
Unisys Corporation  
P.O. Box 500  
Blue Bell, PA 19424-0001

F. Michael Jelley  
The Sun  
399 North D Street  
San Bernardino, CA 92401

Mary Ann Dirzis  
Avon Products  
Nine West 57th Street  
New York, NY 10019-2683

Larry Fuller  
Argus Leader  
200 South Minnesota Avenue  
Box 5034  
Sioux Falls, SD 57117-5034

Dwaine L. Canova  
Zacson  
Suite 220  
3825 Hopyard Road  
Pleasanton, CA 94588

Joseph Marrone  
New Haven Register  
40 Sargent Drive  
New Haven, CT 06511-5918

John F. Sturm  
Newspaper Association of America  
11600 Sunrise Valley Drive  
Reston, VA 22091

Richard L. Holtz  
Journal & Courier  
217 North 6th Street  
LaFayette, IN 47901

Elizabeth Barrett-Anderson  
Guam Attorney General  
Suite 2-200 E  
Judicial Center Building  
120 West O'Brien Drive  
Agana, Guan 96910

James B. Miller  
Pacesetter Corp.  
4343 South 96th Street  
Omaha, Nebraska 68127

Robert S. Peck  
ACLU  
122 Maryland Avenue, N.E.  
Washington, D.C. 20002

Jones Intercable, Inc.  
Peter H. Feinberg  
Dow Lohnes & Albertson  
Suite 500  
1255 23rd Street  
Washington, D.C. 20037

Peter D. O'Connell  
Gannett Co., Inc.  
Reed Smith Shaw & McClay  
1200 18th Street, N.W.  
Washington, D.C. 20036

Richard H. Cowart  
State of Vermont  
City Center - 3rd Floor  
89 Main Street  
State Office Building  
Montpelier, Vermont 05602

Daniel L. Jaffe  
Association of National Advertisers  
1725 K Street, N.W.  
Washington, D.C. 20006

James P. Jacobson  
Office of the Attorney General  
State of Minnesota  
200 Ford Building  
117 University Avenue  
St. Paul, MN 55155

Celia Nogales  
Pacific Telesis  
1275 Pennsylvania Ave., N.W.  
Suite 400  
Washington, D.C. 20004

John Gavin  
D.F. King & Company, Inc.  
77 Water Street  
New York, New York 10005

John F. Baker  
The National Consumers League  
Suite 928N  
815 15th St., N.W.  
Washington, D.C. 20005

Evan Hendricks  
Privacy Times  
P.O. Box 21501  
Washington, D.C. 20009

Frances Stapler  
Investment Company Institute  
1600 M Street, N.W.  
Washington, D.C. 20036

Richardd McClennen  
Detroit Newspaper Agency  
615 W. Layfayette Boulevard  
Detroit, Michigan 48226

Francine J. Berry  
AT&T  
295 North Maple Avenue  
Room 3244-11  
Basking Ridgte, N.J. 07920

Philip S. Corwin  
American Banks Association  
1120 Connecticut Ave., N.W.  
Washington, D.C. 20036

David Cosson  
National Telephone Cooperative  
Association  
2626 Pennsylvania Ave., N.W.  
Washington, D.C. 20037

Basil J. Meziner  
Stein, Mitchell & Mesiner  
Counsel for American Collectors  
Association  
1100 Connecticut Ave., N.W.  
Washington, D.C. 20036

Peter Rohrbach  
Hogan & Hartson  
Counsel for The Student Loan  
Marketing Association  
555 13th Street, N.W.  
Washington, D.C. 20004

Margaret M. Charles  
Swidler & Berlin, Chartered  
Counsel for Safecard Services, Inc.  
3000 K Street, N.W., Ste. 300  
Washington, D.C. 20007

Bob Bergland  
National Rural Electric  
Cooperative Association  
1800 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

Floyd S. Keene  
Ameritech Operating Co.  
Room 4494  
2000 West Ameritech Center Dr.  
Moffman Estates, IL 60196-1025

Joyce A. Jewell  
416 East Second Street  
Bloomington, IN 47401

David L. Jesse  
Pioneer Electric Cooperative  
W. Highway 160/Box 368  
Ulysses, Kansas 67880

Douglas Parker  
Institute for Public Representation  
Georgetown University Law Center  
60 New Jersey Ave., N.W., #312  
Washington, D.C. 20001

Richard Hartgrove  
Southern Bell  
1010 Pine Street  
St. Louis, MO 63101

Thomas Carroccio  
Santarelli, Smith & Carroccio  
Counsel for Household International  
1155 Connecticut Avenue, N.W.  
Washington, D.C. 20036-4306

Mark Gursky  
Courier Times  
8400 Route 13  
Levington, PA 19057

Debra L. Lagapa  
Morrison & Foster  
Counsel for Banc One  
2000 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

James Biddle  
Ohio Student Loan Commission  
309 South Fourth Street  
P.O. Box 1661  
Columbus, Ohio 43226-0610

Diane Killory  
Morrison & Foster  
Counsel for CUC International Inc.  
2000 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Dick Larson  
The Verde Independent  
P.O. Box 429  
116 South Main Street  
Cottonwood, AZ 86326

Jan Volner  
Cohn and Marks  
Counsel for Direct Marketing  
Association  
Suite 600  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 200036

Brenda Fox  
Dow, Lohnes & Alberston  
Counsel for Cox Enterprises Inc.  
1255 23rd Street, N.W.  
Washington, D.C. 20037

Kathryn Ekeler  
ITI Marketing Services  
8712 W. Dodge Road  
Suite 200  
Omaha, NE 68114

Donald Belasco  
The Torning Call  
101 North 6th Street  
Allentown, PA 18105

Michael Lucenford  
Mary Kay Cosmetics Inc.  
8787 Stemmar Freeway  
Dallas, Texas 75247-3794



Peter A. Rohbach  
Hogan & Hartson  
Counsel for Lejenne Associates  
Of Florida  
555 13th Street, N.W.  
Washington, D.C. 20004

Carlos Sandoval  
NYNEX Telephone Companies  
120 Bloomingdale Road  
White Plains, NY 10605

Kevin DiCallo  
Gardner, Carton & Douglas  
Counsel for American Express Company  
1301 K Street, N.W., Suite 900  
East Tower  
Washington, D.C. 20005

Peter O'Connell  
Reed, Smith, Shaw & McClay  
Counsel for Gannett Co., Inc.  
1200 18th Street, N.W.  
Washington, D.C. 20036

Michael Altschul  
Cellular Telecommunication Industry  
Association  
1133 21st Street, N.W.  
Suite 300  
Washington, D.C. 20036

Stephen G. Kraskinn  
Blooston, Mordfskosky, Jackson  
& Dickens  
Counsel for U.S. Intelco  
Networks, Inc.  
2120 L Street, N.W.  
Washington, D.C. 20037

Daniel Bart  
GTE Services Corporation  
Suite 1200  
1850 M Street, N.W.  
Washington, D.C. 20036

John F. Dodd  
Smith, Gill, Fisher & Butts  
Counsel for Independent  
Telecommunications Network, Inc.  
One Kansas City Place  
1200 Main Street, 35th Floor  
Kansas City, MO 64105-2152

Robert Bulmosh  
Private Citizen Inc.  
P.O. Box 233  
Naperville, IL 60566

Charles Walsh  
Fleishman and Walsh  
Counsel for Time Warner Inc.  
1400 16th Street, N.W.  
Washington, D.C. 20036

Albert Kramer  
Keck, Mahn & Kate  
Counsel for North American  
Telecommunications Assoc.  
1201 New York Avenue, N.W.  
Penhouse Suite  
Washington, D.C. 20005

Jay C. Keithley  
Sprint Corporation  
1850 M Street, N.W.  
11th Floor  
Washington, D.C. 20036

Michael Altier  
National Retail Federation  
701 Pennsylvania Ave., N.W.  
Suite 710  
Washington, D.C. 20004

Thomas W. Kirby  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Richard Wiley  
Wiley, Rein & Fielding  
Counsel for Securities Industry  
Association  
1776 K Street, N.W.  
Washington, D.C. 20006

James Cooke  
Morris Beach & Wilcox  
Counsel for Resse Brothers IWC  
1611 N. Kent St., Suite 1000  
Arlington, VA 22209

Mallory Duncan  
JC Penney Company, Inc.  
1156 15th Street, N.W.  
Washington, D.C. 20005

David Dickson  
The Baltimore Sun  
501 North Calvert Street  
Baltimore, MD 21278-0001

Mary Sisak  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Stephen Driesler  
National Association of Realtors  
777 14th Street, N.W.  
Washington, D.C. 20005-3271

David Stillwell  
The Montgomery Advertiser  
200 Washington Avenue  
P.O. Box 1000  
Montgomery, Alabama 38101

Carl O. Buhlman  
9104 Erfurt Court  
Laurel, MD 20708

Jerry Smith  
The Courier Journal  
525 West Broadway  
Louisville, KY 40202

Kyle Fuller  
347 Richards Road  
Columbus, OH 43214

Barrett M. & Shirley Kemp  
833 Prestonwood Drive, #1410  
Richardson, TX 77081

Kelly Knievel  
Western Express Service  
P.O. Box 98524  
Las Vegas, Nevada 89193

Burt K. Shotton  
1802 N. Dayton Street  
Phoenix, AZ 85006

Wallace Ballentine  
Sentinel-Record, Inc.  
POB 580  
Hot Springs Nat'l Park, AR 71902

James F. Lentz  
Audio Technica U.S., Inc.  
1221 Commerce Drive  
Stow, OH 44224-9971

James L. Dimmitt  
Chico Enterprise Record  
400 East Park Ave., POB 9  
Chico, CA 95927-0009

John M. Roberts  
Victoria Advocate  
POB 1518  
Victoria, TX 77902

Jodi M. Wallace  
Electronic Information Systems, Inc.  
1351 Washington Blvd.  
Stamford, CT 06902

Den Dickerson  
Thomasville Times  
POB 650, 106 South St.  
Thomasville, GA 31799

Debbie Fero  
The Review  
116 Main Street, POB 503  
Towanda, PA 18848

Albert J. Holtzinger  
Altoona Mirror  
1000 Green Avenue P.O.B. 20008  
Altoona, PA 16603

Chuck Schussman  
Daily News  
POB 4200  
Woodland Hills, CA 91365-4200

J. Frank Helderman, Jr.  
Gadsden Times  
401 Locust Street, POB 1888  
Gadsden, AL 35999-0188

John B. Raytis  
San Francisco Newspaper Agency  
925 Mission Street  
San Francisco, CA 94103

Michael J. Coleman  
Florida Today  
P.O. Box 363000  
Melbourne, FL 32936

Gary Hauser  
Coalition of Higher Education  
Suite 400  
1101 Vermont Avenue, N.W.  
Washington, DC 20005-3521

Kelly A. McGinnis MD  
1024 South 286th Place  
Federal Way, WA 98003

Mark A. Potts  
The Gleaner  
Box 4, 455 Klutey Park Plaza  
Henderson, KY 42420-0004

Donald J. Byrne  
Idaho State Journal  
POB 431  
305 South Arthur  
Pocatocco, ID 83204

Cheryl ISSOD  
Centre Daily Times  
P.O. Box 89  
State College, PA 16804

Malcolm Applegate  
Indianapolis Star  
POB 145  
Indianapolis, IN 46206-0145

Joe Tarrer  
Santa Barbara News  
De La Guerra Plaza  
POB 1359  
Santa Barbara, CA 93102

Sidney H. Bliss  
Gazette Printing Company  
One South Parker Drive  
Janesville, WI 53545

Buddy King  
Texarkana Gazette  
315 Pine Street  
Texarkana, TX 75504

Ralph O'Henry  
The Facts  
POB 549  
Clute, TX 77531

Don D. Davidson  
Cuna Mutual Insurance  
5910 Mineral Point Road, POB 391  
Madison, WI 53701-0391

Richard Ferris  
Lansing State Journal  
120 E. Lenawee Street  
Lansing, MI 48919

Ashton Phelps  
The Times-Picayune  
3800 Howard Avenue  
New Orleans, LA 70140-1097

Robert L. Zier  
Wachovia Student  
Financial Services, Inc.  
POB 3176  
Winston & Salem, NC 27102

Will McClure  
Infiniti Group, Inc.  
POB 480  
Troy, OH 45373

Alex Machaskee  
The Plain Dealer  
1801 Superior Ave.  
Cleveland, OH 44114

Joyce Fedior  
Thomas Construction  
4283 Shoreline Drive  
Earth City, MO 63045

Orage Quarles III  
Stockton Record  
530 E. Market Street  
Stockton, CA 95202

Daniel E. Lungren  
California Dept. of Justice  
300 Spring Street, Suite 5212  
Los Angeles, CA 90013

Nancy Barthelmess  
10290 Vicksburg Drive  
Cupertino, CA 95014

Lynne Hanchett  
Kirk Felgenhauer  
Daily News  
POB 4200  
Woodland Hills, CA 91365-4200

Gary Hauser  
Coalition of Higher Ed.  
1101 Vermont Ave., N.W.  
Suite 400  
Washington, DC 20005-3521

Tom Dickens  
Press Journal  
P.O. Box 1268  
Vero Beach, FL 32961

Martin T. McCue & Linda Kent  
U.S. Telephone Assoc.  
900 19th Street, NW - Suite 800  
Washington, DC 20006-2105

Paul E. Jones  
Orlando Sentinel  
633 North Orange Ave.  
Orlando, FL 32801

Cynthia S. Anthony  
Teknekron Infeswitch  
4425 Cambridge Road  
Forth Worth, TX 26155

James B. Groff  
National Association of  
Water Companies  
1725 K Street, NW  
Suite 1212  
Washington, DC 20006-1401

Ken McEldowney  
Consumer Action  
116 New Montgomery Street  
Suite 223  
San Francisco, CA 94105

J.C. Hickman  
Bellingham Herald  
1155 States Street POB 1277  
Bellingham, WA 98227

Messagephone, Inc.  
Janice LeRoy  
59510 N. Central Expressway  
Suite 1575  
Dallas, TX 75206

Arthur E. Mayhew  
Bucks County Courier Times  
8400 Route 13  
Levittown, PA 19057

Gary D. Wamsley  
Midland Daily News  
Box 432  
Midland, Michigan 48640

Stephanie Grubert  
Pennsylvania Newspaper  
2717 North Front Street  
Harrisburg, PA 17110

Michael J. Shortley, III  
Rochester Telephone  
160 So. Clinton Ave.  
Rochester, NY 14646-0700

William C. Greene  
Huntsville Times  
POB 1487 - West Station  
Huntsville, Alabama 35807

George Arwady  
Kalamazoo Gazette  
401 So. Burdick Street  
POB 2007  
Kalamazoo, Mich 49003

September Wethington-Smith  
Norwest Card Services  
Regency 4, Suite 200  
4700 Westown Parkway  
West Des Moines, Iowa 50265

Jerry H. Wagner  
Rocky Mtn. Bankcard Sys.  
POB 5952  
Denver, CO 80217

Brian R. Moir  
Fisher, Wayland Cooper & Leader  
1255 23rd Street, NW  
Suite 800  
Washington, DC 20037-1170

Harold Higgins  
Aberdeen American News  
Box 4430  
124 S. Second Street  
Aberdeen, SD 57402-4430

William B. Baker  
Wiley Rein & Fielding  
1776 K Street, N.W.  
Washington, DC 20006



Thomas A. Stroup  
Telocator  
1019 19th Street N.W.  
Suite 1100  
Washington, DC 20036

William J. Cowan  
NY Dept. of Public Service  
3 Empire State Plaza  
Albany, NY 12223

William C. Marcil  
Forum Publishing Co.  
Box 2020  
Fargo, ND 58107

Jeffrey D. Goltz  
Washington State Attorney's Ofc.  
1400 S. Evergreen Park Drive, SW  
P.O. Box 40128  
Olympia, WA 98504-0128

Fred A. Stickel  
Oregonian Publishing  
Portland, OR 97201

Debra Lehman  
PNC Financial Corp.  
Pittsburgh, PA 18265

Rex D. Ledo  
Tampa Tribune  
P.O. Box 191  
Tampa, FL 33601